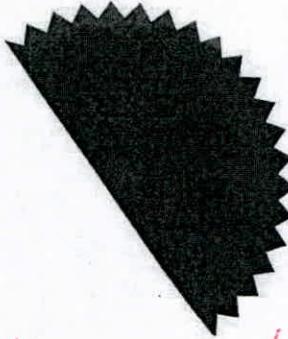


NOV 23 2016

AP GREENBELT  
CLERK'S OFFICE, DISTRICT COURT  
DISTRICT OF MARYLAND  
NAM: USAO 2014R00580  
BY DEPUTY



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

SEANDELL HECTOR,

Defendant

\* UNDER SEAL

\*

\* CRIMINAL NO.

\*

\* (Intentional Damage to a Protected  
\* Computer, 18 U.S.C. §§ 1030(a)(4) and  
\* (c)(3)(A); Forfeiture, 21 U.S.C. § 853  
\* and 18 U.S.C. § 1030(i))

\*

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INFORMATION

COUNT ONE

The United States Attorney for the District of Maryland charges that:

Between in or about 2010 and in or about March 2015, in the District of Maryland and elsewhere, the defendant,

SEANDELL HECTOR,

knowingly and with the intent to defraud, accessed a protected computer without authorization, and by means of such conduct furthered the intended fraud and obtained something of value.

18 U.S.C. §§ 1030(a)(4) and (c)(3)(A)

**FORFEITURE ALLEGATION**

The United States Attorney for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1030(i), in the event of the defendant's conviction on Count One of this Information.

2. As a result of the offense set forth in Count One, the defendant,

**SEANDELL HECTOR,**

shall forfeit to the United States any personal property that was used or intended to be used to commit or to facilitate the commission of the offense in Count One, and any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, including but not limited to:

- (i) a money judgment in the amount of \$150,000;
- (ii) one Apple iPhone 6+ A1522 IMEI: 354392060543389, S/N FKINDK71G5QJ;
- (iii) two AT&T LG cell phones;
- (iv) one AT&T cell phone;
- (v) four AT&T mobile hotspots;
- (vi) one custom-built Cooler Master desktop computer with power cable and power strip, black in color, barcode #RC922MKKN11103801104;
- (vii) Acer laptop, S/N: NXRZAAA008237123EB3400, and power cord;
- (viii) Acer laptop computer LX AT90X, no S/N, no charger;
- (ix) Acer Aspire One notebook computer, SNID: 03452314016;

- (x) Lenovo laptop with power cord, S/N: CBU2417771 (no battery);
- (xi) one carding machine, model: MSRE206, #A212090119;
- (xii) Alfa Network 802.11 long range adapter, S/N: 1001036H59516;
- (xiii) Linksys Wireless-G range expander, S/N: MGB20H312724, MAC #001EE5A13124;
- (xiv) Lynksys Wireless-G range expander, Model: WRE546; S/N: MGB20J501796;
- (xv) one Hitachi hard drive, 40 GB, Model: IC351060AVV207-0, P/N: 07N9673;
- (xvi) HDD - WD 160GB, S/N: WX81A30D2360, M/N: WD1600BEVT;
- (xvii) three hard drives: (1) Fujitsu model #MHS2040AT, S/N N162T3714K8A, (2) desktop hard drive, sticker #36047100290, and (3) desktop hard drive, sticker #36047100291;
- (xviii) Cirago USB 2.0 high speed LX-900018717, with cable;
- (xix) black thumb drive USB;
- (xx) flash drive 32 GB PNY Attaché;
- (xxi) T-Mobile SIM card;
- (xxii) one SD card 2GB - WK9765P, one Micro SD card 16GB - MMCTR16GVACJ-AC;
- (xxiii) various DVDs and CDs;
- (xxiv) various debit cards, credits cards, gift cards, blank cards, and checks;
- (xxv) two Pebble Smartwatches (red watch S/N: 3N101363C475, and orange watch S/N: 341014FCB6D (unopened in box)); and

(xxvi) GoPro HERO3 and remote, CNFCHDHX301.

**Substitute Assets**

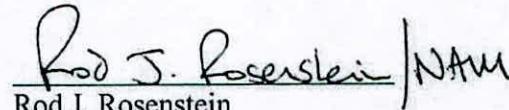
3. If, as a result of any act or omission of the defendant, any property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p), up to the value of the forfeitable property.

18 U.S.C. § 1030(i)

21 U.S.C. § 853

  
Rod J. Rosenstein  
United States Attorney

Date: November 23, 2016